

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, WELLS FARGO TRUST COMPANY,
N.A., solely in its capacity as OWNER TRUSTEE,
and UMB BANK, N.A., solely in its capacity as
OWNER TRUSTEE,

Defendants.

20 Civ. 9713 (LLS)

**NOTICE OF MOTION
FOR JUDGMENT AS A
MATTER OF LAW**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendants AMCK Aviation Holdings Ireland Limited, Accipiter Investments Aircraft 4 Limited, and Vermillion Aviation (Two) Limited (“Defendants”), hereby respectfully move this Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, for an Order granting Defendants’ Motion for Judgment as a Matter of Law pursuant to Rule 52(b) of the Federal Rules of Civil Procedure.

Dated: July 12, 2024

Respectfully submitted,

s/ Jeff E. Butler

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